

THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

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ANNA CHIMANSKI, *et., al.*,

Case No. 17-CV-4306

**Plaintiff**

vs.

**HON. AMY J. ST.EVE**

**FRONTIER AIRLINES INC**

**Defendant**

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**NOTICE OF FILING OF PLAINTIFF'S MOTION TO STRIKE AFFIRMATIVE DEFENSES PURSUANT TO RULE 12(f)(2) OF FED. R. CIV. PROCEDURE**

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TO: Honorable Amy J. St.Eve.  
Everett McKinley Dirksen Building  
Courtroom 1241 | Chambers 1260  
219 South Dearborn Street  
Chicago, Illinois 60604

TO: Emmett Michael Shaughnessy, Esq  
Adler Murphy & McQuillen LLP.  
20 S. Clark Street, Suite 2500,  
Chicago, Illinois 60603

**PLEASE TAKE NOTICE** that on this 28<sup>th</sup> date of August 2017 the above-named plaintiff by and through its attorney has filed via ECV system the following legal document: **Plaintiff's Motion to Strike Defendant's Affirmative Defenses pursuant to the Rule 12(f)(2) of Fed. R. Civil Procedure**. This Notice is duly served upon you pursuant to LR 5.4. and 5.5.

Dated this 28<sup>th</sup> day of August 2017.

Respectfully submitted by  
GOROKHOVSKY LAW OFFICES, LLC  
Attorney for Plaintiffs

BY: Vladimir Gorokhovsky, Esq.

/s/ Vladimir Gorokhovsky, LL.M.  
ILND TR. 10994

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ANNA CHIMANSKI, *et., al.*,

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Plaintiff

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CERTIFICATE OF SERVICE OF  
PLAINTIFF'S MOTION TO STRIKE AFFIRMATIVE DEFENSES PURSUANT  
TO RULE 12(f)(2) OF FED. R. CIV. PROCEDURE

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Under penalties as provided by law and pursuant to Local Rule 5.3(a)(b) and 5.5(b) the undersigned certifies that the within pleadings were served via CM/ECF filling upon defendant's counsel, **Attorney Emmett Michael Shaughnessy of Adler Murphy & McQuillen, 20 S. Clark Street, Suite 2500, Chicago, Illinois 60603** on August 28, 2017.

Dated this Notice on this 28<sup>th</sup> day of August 2017.

Respectfully submitted by:

GOROKHOVSKY LAW OFFICES, LLC  
Attorney for Plaintiffs

BY: Vladimir Gorokhovsky, Esq  
/s/Vladimir Gorokhovsky, LL.M.  
ILND TR. 10994

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